

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20587

RQ-2

Thomas C. Roberts, Treasurer
Van Ness Feldman PC Political Action Committee
(AKA Van Ness Feldman Political Action Committee
1050 Thomas Jefferson Street, N.W., Suite 700
Washington, DC 20007

FEB 12 2003

Identification Number: C00205369

Reference: October Monthly Report (9/1/02-9/30/02)

Dear Mr. Roberts:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report discloses a \$7,500 payment to your connected organization for candidates (pertinent portion(s) attached). 2 U.S.C. §441b prohibits a corporation or labor organization from contributing or expending funds for the purpose of influencing any federal election; however, a connected organization may pay for the solicitation and administrative costs of its separate segregated fund.

Please amend your report to clarify whether the payment to your connected organization was for expenditures which were intended to influence federal elections and provide the dates of the activity conducted by your connected organization. Although the Commission may take further legal action concerning this matter, your prompt action will be taken into consideration.

-Schedule B of your report (pertinent portion(s) attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a non-monicandidate political committee and its affiliates, from making a contribution to a candidate for federal office in excess of \$1,000 per election.

VAN NESS FELDMAN PC POLITICAL ACTION COMMITTEE (AKA VAN NESS
FELDMAN POLITICAL ACTION CMTE.

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If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount.

If your committee has met the criteria for multicandidate status, please file FEC FORM 1M "Notification of Multicandidate Status" with the Commission. The treasurer must file FEC FORM 1M prior to making a contribution of more than \$1,000 per candidate per election. 11 CFR §102.2(a)(3)

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

A response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments (to include statements, designation and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need

VAN NESS FELDMAN PC POLITICAL ACTION COMMITTEE (AKA VAN NESS
FELDMAN POLITICAL ACTION CMTE.

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assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,


Brandy Phillips
Campaign Finance Analyst
Reports Analysis Division

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Disbursement Page	FOR LINE NUMBER: (check only one)	1 PAGE 25/33
	<input type="checkbox"/> 24-1	<input type="checkbox"/> 22
	<input type="checkbox"/> 26	<input type="checkbox"/> 23
	<input type="checkbox"/> 27	<input type="checkbox"/> 24
	<input type="checkbox"/> 29	<input type="checkbox"/> 25
	<input type="checkbox"/> 29A	<input type="checkbox"/> 26
	<input type="checkbox"/> 28B	<input type="checkbox"/> 26C
	<input type="checkbox"/> 28	<input type="checkbox"/>

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions
or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in full)
Van Ness Feldman, P.C.

Full Name (Last, First, Middle initial)
A. John Carnahan

Mailing Address
4226 Lindell Street
City
St. Louis
State: MO Zip Code
Purpose of Disbursement

Buile 106
MO 63108

Candidate Name	Category Type
----------------	---------------

Office Sought:	House	Disbursement For:	2002
	<input checked="" type="checkbox"/> Senate	<input checked="" type="checkbox"/> Primary	General
	President	Other (Specify):	<input type="checkbox"/>
State: MO	District:		

Full Name (Last, First, Middle initial)
B. Larry Craig

Mailing Address
P.O. Box 857
City
Boise
State: ID Zip Code
Purpose of Disbursement

ID 83701

Candidate Name	Category Type
----------------	---------------

Office Sought:	House	Disbursement For:	2002
	<input checked="" type="checkbox"/> Senate	<input checked="" type="checkbox"/> Primary	General
	President	Other (Specify):	<input type="checkbox"/>
State: ID	District:		

Full Name (Last, First, Middle initial)
C. Larry Craig

Mailing Address
P.O. Box 857
City
Boise
State: ID Zip Code
Purpose of Disbursement

ID 83701

Candidate Name	Category Type
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Office Sought:	House	Disbursement For:	2002
	<input checked="" type="checkbox"/> Senate	<input checked="" type="checkbox"/> Primary	General
	President	Other (Specify):	<input type="checkbox"/>
State: ID	District:		

SUBTOTAL of Disbursements This Page (optional) 2000.00

TOTAL This Period (not page this line number only) 2000.00

SCHEDULE B (FEC Form 30)
ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER (check one or more)	PAGE 3 of 6
	<input type="checkbox"/> 21b	22
	<input type="checkbox"/> 26	23
	<input type="checkbox"/> 27	24
	<input type="checkbox"/> 20a	25
	<input type="checkbox"/> 28b	26
	<input type="checkbox"/> 28c	27

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or factitious financial purposes, other than using the name and address of any political committee to valid qualifications from such committee.

NAME OF COMMITTEE (In full)
Van Ness Feldman, P.C.

Full Name (Last, First, Middle Initial) A. Long Craig		Date of Disbursement 05/14/2002
Mailing Address P.O. Box 607 City Bolton		State ID Zip Code 63701
Purpose of Disbursement		Amount of Each Disbursement This Period 400.00
Candidate Name		Category/ Type
Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) F	
State: ID District: 10		Transaction ID: SB23-4431
Full Name (Last, First, Middle Initial) B. J.D. Mayworth		Date of Disbursement 05/14/2002
Mailing Address 10780 N. 19th Street Suite 102 City Scottsdale		Amount of Each Disbursement This Period 500.00
State: AZ District: 8		Category/ Type
Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) F	
State: AZ District: 8		Transaction ID: SB23-4432
Full Name (Last, First, Middle Initial) C. John Shankue		Date of Disbursement 05/14/2002
Mailing Address P.O. Box 5456 City Springfield		Amount of Each Disbursement This Period 1000.00
State: IL District: 10		Category/ Type
Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) F	
State: IL District: 10		Transaction ID: SB23-4433
SUBTOTAL of Disbursements This Page (continued) 2000.00		
TOTAL This Period (last page has five number total) 2000.00		

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

Use separate schedules for each category of the Detailed Summary Page	FORM NUMBER: (reverse only if applicable)	PAGE 3/7
	<input type="checkbox"/> 21-b <input type="checkbox"/> 22 <input type="checkbox"/> 23 <input type="checkbox"/> 24 <input type="checkbox"/> 25 <input type="checkbox"/> 26 <input type="checkbox"/> 27 <input type="checkbox"/> 28a <input type="checkbox"/> 28b <input type="checkbox"/> 24a <input type="checkbox"/> 29	

Any information copies from such Reports and Statements may be sent or used by any person for the purpose of following contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

> NAME OR COMMON NAME (on PSC)
 Van Ness Feldman, P.C.

Full Name (Last, First, Middle Initial)		Date of Disbursement	
B. Van Ness Feldman, P.C.		08/15/2002	
Mailing Address		Amount of Each Disbursement this Period	
1000 Thomas Jefferson Street, NW		1000.00	
City	State	Zip Code	
Washington	DC	20007	
Purpose of Disbursement		Transaction ID:	
		5B23-4531	
Candidate Name		Date of Disbursement	
Rick Bloucher		08/15/2002	
Office Sought:	House Senate President	Disbursement For:	2002
State: VA	District: 4	Primary	<input checked="" type="checkbox"/> General
		Other (Specify) <input type="checkbox"/>	
Full Name (Last, First, Middle Initial)		Amount of Each Disbursement this Period	
C. Van Ness Feldman, P.C.		1000.00	
Mailing Address		Transaction ID:	
1000 Thomas Jefferson Street, NW		5B23-4527	
City	State	Zip Code	
Washington	DC	20007	
Purpose of Disbursement		Date of Disbursement	
		08/15/2002	
Candidate Name		Amount of Each Disbursement this Period	
Larry Craig		500.00	
Office Sought:	House Senate President	Disbursement For:	2002
State: ID	District: 1	Primary	<input checked="" type="checkbox"/> General
		Other (Specify) <input type="checkbox"/>	
Full Name (Last, First, Middle Initial)		Transaction ID:	
D. Van Ness Feldman, P.C.		5B23-4528	
Mailing Address			
1000 Thomas Jefferson Street, NW			
City	State	Zip Code	
Washington	DC	20007	
Purpose of Disbursement			
Candidate Name			
Larry Craig			
Office Sought:	House Senate President	Disbursement For:	2002
State: ID	District: 1	Primary	<input checked="" type="checkbox"/> General
		Other (Specify) <input type="checkbox"/>	
SUBTOTAL of Disbursements This Page (optional) 2500.00			
TOTAL This Period (last page this line numbers only) 2500.00			
FEC Schedule B (Revised 4/2001)			

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